

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| The Use of N11 Codes and Other |) | CC Docket No. 92-105 |
| Abbreviated Dialing Arrangements |) | |

**REPLY COMMENTS OF THE KANSAS DEPARTMENT OF
TRANSPORTATION (KDOT)**

KDOT hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes.

I. 511 IMPLEMENTATION IN KANSAS

The Kansas Department of Transportation deployed 511 in Kansas on January 15, 2004. The system provides fully automated, near real-time, route-specific road conditions, construction detours, and travel weather (both current and forecasted) information for the Kansas State Highway System and the Kansas Turnpike. Travelers can also request information for Nebraska State Highways (the only surrounding state with 511). As other states surrounding Kansas deploy 511, access to their information will also be provided. Kansas 511 may also broadcast active AMBER, General Transportation or Homeland Security Alerts.

Callers may call 511 from anywhere in the state by landline or cellular phones. The system offers voice response and/or touch-tone options for users to request road-specific information.

As of November 18, 2004, the Kansas 511 System has received 172,167 calls. Without system promotion, 72,069 calls were received in the month of February; with daily call volumes as high as 17,676 during severe winter weather. Since deploying, February has marked the highest number of calls, with the lowest monthly call volume to date being during April (6,159 calls). The mean average monthly call volume has been 10,759.

Usage analysis to date reveals that weather is the number one cause for high call volumes, particularly during winter inclement weather. More than 26,000 calls were received in January, with almost half of those calls received during a two-day severe winter storm, and over 72,000 calls were received in February, with almost 38,000 calls received during days of severe winter weather. Call volumes during spring and summer also spiked during days with storm warnings/watches or during severe spring weather, and were most notably observed during the month of May.

Prior to 511, road condition information was provided to Kansas travelers by a road condition hotline that provided regional weather-related road condition information and selected construction/detour information. The system was primarily used and most frequently updated during severe winter weather. Use of 511 during non-winter, weather-related periods has shown significant increase, with minimal promotion. With continued promotion efforts, it is believed the traveling public will rely upon 511 to provide travel information for not only severe winter weather but also severe weather during other seasons as well as construction/detour information to aid them in their trip planning.

The Kansas 511 System includes a comment line whereby users may leave comments. The introductory system message encourages users to give us feedback about the system and their experience in using it. To date, more than 800 comments have been received with the majority of comments being extremely positive—users like 511 and find it helpful and easy to use. They like the option of voice or touch-tone commands. Many callers have told us what a great improvement 511 is over our Road Condition Hotline—511 is simpler, more complete and quicker to use (they like being able to request the specific route and segment for which they want information).

Less than one percent of the comments have expressed concerns or criticism, and in some cases, the comments have reflected some misunderstanding in obtaining information from the system.

System enhancements planned for the Kansas 511 system include improved/enhanced voice technology, expanded information for metropolitan cities

(the greater Kansas City metropolitan area, Wichita and Topeka). As resources allow, system content, such as transit information are planned for the system.

II. PETITIONERS CONCERNS

KDOT wishes to specifically address the comments filed by the wireless carriers and CTIA as they pertain to 511. In general, KDOT understands that the carriers and CTIA identified three primary issues: (1) ambiguity regarding which government entities should have access to 511 and how carriers should resolve mutually exclusive requests; (2) problems associated with wireless carrier network topology not aligning with 511 service areas; and, (3) the assertion that government-provided 511 services act as a private market inhibitor. KDOT concurs with AASHTO and the 511 Deployment Coalition's belief that no further action from the FCC is needed at this time, as issues are being adequately handled in the implementation process and that 511 is not, and does not attempt to, inhibit the introduction and expansion of commercial traveler information services.

III. AMBIGUITY OF WHAT ENTITIES SHOULD HAVE ACCESS TO 511

On December 7, 2001, Bill Graves, the Governor of Kansas at that time, authorized KDOT to assume the leadership and coordination responsibilities for implementing 511.

The planning and implementation of 511 has been extremely well supported by numerous stakeholders, all of which were supportive of KDOT's leadership in implementing and managing 511. KDOT has sought input and cooperation with stakeholders in the design and implementation of the system and will continue to do so in the future. Many stakeholders, including public and private sector, have expressed great support and appreciation for KDOT's willingness to "own" the system.

IV. WIRELESS CALL ROUTING NOT IN ALIGNMENT WITH 511 SERVICE BORDERS

KDOT agrees with the Petitioners that the topology of wireless networks does not always align with the desired service boundaries of statewide or regional 511 services,

but concurs with AASHTO and its partner organizations that the concerns about geographic difficulties are misplaced and that the issues/problems are being addressed by the 511 programs themselves.

In Kansas, the greater Kansas City metropolitan area is split between Kansas and Missouri. During the build phase of the system and to present, KDOT has only encountered one wireless company that provided challenges with cell tower coverage. Verizon Wireless has a tower in the Kansas City area that services thirteen counties in Missouri and 8 counties in Kansas. In working with Verizon, alternatives have been identified to dealing with satisfactory solutions for 511 access in both states. While final negotiations have not occurred between KDOT and the Missouri Department of Transportation, it is anticipated that satisfactory solutions can be obtained.

V. 511 SERVICES INHIBIT PRIVATE MARKET OPPORTUNITIES

KDOT has received no complaints from private sector about 511 to date.

VI. CONCLUSION

While 511 in Kansas has been operative for less than one year, KDOT feels that public response is overwhelmingly positive and Kansans have repeatedly articulated they like the service and want it to continue. With past, current, and planned enhancements, Kansas continues to invest in 511 and in providing a quality service to Kansas travelers. Furthermore, since Kansas has experienced very little of the issues identified by the Petitioners in our state/region, we do not support additional rulemaking associated with 511 at this time.